FILED 1 GARY M. RESTAINO United States Attorney 2 District of Arizona 2023 FEB -2 PM 2: 21 CRAIG H. RUSSELL Assistant U.S. Attorney United States Courthouse 3 CLERK US DISTRICT COURT DISTRICT OF ARIZONA 4 405 W. Congress Street, Suite 4800 Tucson, Arizona 85701 5 Telephone: 520-620-7300 Email: craig.russell@usdoj.gov CR23-00124 TUC-SHR(JR) 6 Attorneys for Plaintiff 7 IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA 8 9 INDICTMENT United States of America, (UNDER SEAL) Plaintiff, 10 VS. 11 Violations: 12 21 U.S.C. § 846 (Conspiracy to Distribute Fentanyl. Cocaine, and Heroin) 13 2. Count 1 Gerardo Bernal-Mazon, (Counts 1, 2, 3, 6) 14 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(ii)
(Possession with Intent to Distribute 15 Ashley Bernal. (Counts 1, 2, 3, 12, 13) Fentanyl) 16 Counts 2, 3, 12 17 18 19 Juan Murillo, 6. 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(ii) 20 (Counts 1, 6) (Possession with Intent to Distribute 21 7. Jessica Yesenia Valenzuela, (Counts 1, 7) Cocaine) Counts 5, 6, 10 22 Lilian Sugey Siegfried, 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(i) 23 (Counts 1, 7) 24 (Possession with Intent to Distribute 9. Delyanira Lovio, (Counts 1, 8, 9, 10, 11) Heroin) 25 Count 7 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(i) Defendants. 26 (Possession with Intent to Distribute 27 Heroin) 28 Count 8

21 U.S.C. § 952(a) and §§ 960(a)(1) and 960(b)(1)(A) 1 (Importation of Heroin) 2 Count 9 3 21 U.S.C. § 952(a) and §§ 960(a)(1) and 960(b)(2)(B)(ii) 4 (Importation of Cocaine) Count 11 5 21 U.S.C. § 952(a) and §§ 960(a)(1) and 960(b)(2)(F) (Importation of Fentanyl) 7 Count 13 8 9 THE GRAND JURY CHARGES: 10 **COUNT 1** 11 Beginning at a time unknown, to on or about January 25, 2023, in the District of 12 **GERARDO** Arizona, BERNAL-MAZON, **ASHLEY** 13 BERNAL, **JUAN** 14 MURILLO, JESSICA YESENIA VALENZUELA, LILIAN SUGEY SIEGRIED, and 15 DELYANIRA LOVIO did knowingly and intentionally combine, conspire, confederate 16 and agree with persons known and unknown to the grand jury, to distribute 400 grams or 17 more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II 18 controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 19 841(b)(1)(A)(vi); 500 grams or more of cocaine, a Schedule II controlled substance; in 20 violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II); and 21 1 kilogram or more of heroin, a Schedule I controlled substance, in violation of Title 21, 22 United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i). 23 All in violation of Title 21, United States Code, Section 846. 24 COUNT 2 25 On or about January 20, 2022, in the District of Arizona, 26 GERARDO BERNAL-MAZON and ASHLEY BERNAL did knowingly and intentionally 27 28 United States of America v. Indictment Page 2 of 5

possess with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vi).

COUNT 3

On or about February 23, 2022, in the District of Arizona, JOSE RUELAS-SILLAS, GERARDO BERNAL-MAZON and ASHLEY BERNAL did knowingly and intentionally possess with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vi).

COUNT 6

On or about May 4, 2022, in the District of Arizona, GERARDO BERNAL-MAZON, and JUAN MURILLO did knowingly and intentionally possess with intent to distribute 500 grams or more of cocaine,

United States of America v.
Indictment Page 3 of 5

a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II).

COUNT 7

On or about May 16, 2022, in the District of Arizona, JESSICA YESENIA VALENZUELA and LILIAN SUGEY SIEGFRIED did knowingly and intentionally possess with intent to distribute 100 grams or more of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(i).

COUNT 8

On or about June 10, 2022, in the District of Arizona, DELYANIRA LOVIO did knowingly and intentionally possess with intent to distribute 1 kilogram or more of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i).

COUNT 9

On or about June 10, 2022, in the District of Arizona, DELYANIRA LOVIO did knowingly and intentionally import into the United States from the Republic of Mexico 1 kilogram or more of heroin, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(1)(A).

COUNT 10

On or about June 10, 2022, in the District of Arizona, DELYANIRA LOVIO did knowingly and intentionally possess with intent to distribute 500 grams or more of cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II).

COUNT 11

On or about June 10, 2022, in the District of Arizona, DELYANIRA LOVIO did knowingly and intentionally import into the United States from the Republic of Mexico

1 500 grams or more of cocaine, a Schedule II controlled substance; in violation of Title 21, 2 United States Code, Sections 952(a), 960(a)(1) and 960(b)(2)(B)(ii). 3 4 COUNT 12 5 On or about July 8, 2022, in the District of Arizona, ASHLEY BERNAL did 6 knowingly and intentionally possess with intent to distribute 40 grams or more of a mixture 7 or substance containing a detectable amount of fentanyl, a Schedule II controlled 8 substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 9 841(b)(1)(B)(vi). 10 **COUNT 13** On or about July 8, 2022, in the District of Arizona, ASHLEY BERNAL did 11 12 knowingly and intentionally import into the United States from the Republic of Mexico 40 13 grams or more of a mixture or substance containing a detectable amount of fentanyl, a 14 Schedule II controlled substance; in violation of Title 21, United States Code, Sections 15 952(a), 960(a)(1) and 960(b)(2)(F). 16 A TRUE BILL 17 18 19 FOREPERSON OF THE GRAND JURY Date: February 2, 2023 20 REDACTED FOR 21 Public disclosure GARY M. RESTAINO 22 United States Attorney District of Arizona 23 24 CRAIG H. RUSSELL 25 Assistant U.S. Attorney 26 27 United States of America v. . 28 Indictment Page 5 of 5